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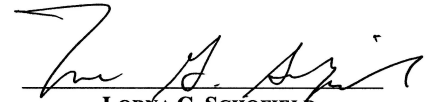
March 27, 2020

BY ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Application GRANTED in part. The conference scheduled for April 7, 2020, is adjourned to **June 11, 2020, at 10:50 a.m.** Per the order at Dkt. No. 6, parties shall file a proposed Case Management Plan and joint letter by at least seven days before the conference.

Date: March 30, 2020
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Baez v. United States*, 20 Civ. 1091 (LGS)

Dear Judge Schofield:

On February 25, 2020, the Court scheduled an initial conference in this action for April 7, 2020 and ordered the parties to submit a status letter summarizing the case. This letter constitutes the parties' joint request for a 60-day adjournment of the conference to June 9, 2020.¹

Defendant has not yet served an answer in the instant case and indicated that the answer is not due until May 15. Defense counsel has not been able to discuss this case with the Veterans Affairs ("VA") hospital and the treating medical providers involved in this litigation to properly understand the nature and scope of this case and any potential defenses, including whether there are any procedural or jurisdictional defenses that could form the basis of a motion to dismiss. In light of the current situation affecting medical providers and hospitals in New York City, the parties would benefit from additional time to gather the relevant facts to respond to the complaint and thereafter begin discovery. This proposal would minimize any potential burden on the VA hospital and medical providers in the next several weeks.

In addition, there is an accompanying action in Supreme Court, New York County (Index No. 805036/2020) wherein defendant Hassan Mohamed, M.D. has yet to interpose an Answer. Plaintiff intends to join the Supreme Court action with the above-entitled case pursuant to supplemental jurisdiction and amend the Complaint to add additional parties since the claims of negligence in the Supreme Court action are substantially related to those originally claimed

¹ Should the Court grant the parties' request for an adjournment, both parties will submit a proposed case management plan and the seven categories of information sought pursuant to the Court's February 25, 2020 Order a week prior to the rescheduled initial conference date.

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herein. Accordingly, with the consent of the U.S. Attorney, Plaintiff respectfully requests that the initial conference be adjourned to June 9, 2020 to permit the additional parties to appear. An adjournment would permit both parties to engage in meaningful and expedient discovery while promoting judicial economy. No prior requests for an adjournment or extension of time have been made.

The parties thank the Court for its attention to this matter.

Sincerely,

GUY S. REGEV, M.D., ESQ.

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